

Counsel Listed on Next Page

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

EDWARD ABRAM, JR., NAJLA WAHEED, RICHARD ZEMEL, and ROSALYN CEASAR, individually and on behalf of all others similarly situated, and on behalf of the general public,

Plaintiffs,

VS.

AMERICAN HOME MORTGAGE
INVESTMENT CORP., AMERICAN HOME
MORTGAGE CORP., and DEFENDANT
DOES 1-50.

Defendants.

Case No. C07-03252

CLASS ACTION

**STIPULATION TO EXTEND
TIME FOR DEFENDANTS
AMERICAN HOME MORTGAGE
INVESTMENT CORP. AND
AMERICAN HOME MORTGAGE
CORP. TO RESPOND TO
PLAINTIFFS' COMPLAINT**

1 NICHOLS KASTER & ANDERSON, LLP
2 Bryan J. Schwartz, CA State Bar No. 209903
3 One Embarcadero Center, Suite 720
4 San Francisco, CA 94111
Telephone: 415-277-7235
Facsimile: 415-277-7238

5 NICHOLS KASTER & ANDERSON, PLLP
Matthew C. Helland, MN State Bar No. 346214
(admitted *pro hac vice*)
6 Paul J. Lukas, MN State Bar No. 22084X
(*pro hac vice* application forthcoming)
7 Donald H. Nichols, MN State Bar No. 78918
(*pro hac vice* application forthcoming)
8 80 South Eighth Street, Suite 4600
Minneapolis, MN 55402
9 Telephone: 612-256-3200

10 OUTTEN & GOLDEN, LLP
Adam T. Klein, NY Bar No. AK 3293
(admitted *pro hac vice*)
11 Jack A. Raisner, NY Bar No. JR 6171
(admitted *pro hac vice*)
12 3 Park Avenue, 29th Floor
13 New York, New York 10016
Telephone: 212-245-1000

14 Attorneys for Individual and Representative Plaintiffs
15 EDWARD ABRAM, JR., NAJLA WAHEED,
RICHARD ZEMEL, and ROSALYN CEASAR

17 JACKSON LEWIS LLP
18 Scott O. Oborne, CA State Bar No. 191257
121 SW Salmon Street, 11th Floor
19 Portland OR 97204
Telephone: 503-229-0404
20 Facsimile: 503-229-0405

21 Attorneys for Defendants
22 AMERICAN HOME MORTGAGE INVESTMENT CORP. and
AMERICAN HOME MORTGAGE CORP.

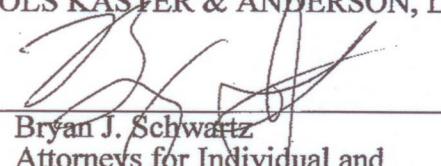
1 Plaintiffs EDWARD ABRAM, JR., NAJLA WAHEED, RICHARD ZEMEL and
2 ROSALYN CEASAR, individually and on behalf of all other similarly situated individuals
3 ("Plaintiffs") and Defendants AMERICAN HOME MORTGAGE INVESTMENT CORP. and
4 AMERICAN HOME MORTGAGE CORP. (Defendants collectively referred to herein as
5 "AHM") (Plaintiffs and Defendants collectively referred to herein as "the Parties") hereby
6 stipulate to the following extension of time for AHM for respond to Plaintiffs' Complaint for
7 Damages, Restitution and Injunctive Relief ("Complaint"):

- 8 1. Plaintiffs filed this action in the United State District Court, Northern District of
9 California on June 20, 2007. Plaintiffs served AHM with a copy of the Complaint on
10 June 22, 2007. The last day for AHM to respond to Plaintiffs' Complaint is July 12,
11 2007.
- 12 2. Pursuant to Local Rule 6-1(a), the Parties hereby stipulate that AHM will have an
13 extension of time to respond to Plaintiffs' Complaint until August 13, 2007. Local Rule
14 6-1(a) provides that "[p]arties may stipulate in writing, without a Court order, to extend
15 the time within which to answer or otherwise respond to the complaint . . . provided the
16 change will not alter the date of any event or any deadline already fixed by the Court."
17 Civ. L.R. 6-1(a). This stipulation will not affect the dates, if any, set by the Court in this
18 matter.
- 19 3. To the extent permitted by law, the Parties further hereby stipulate that as to individual
20 class members who "opt in" to this litigation pursuant to 29 U.S.C. § 216(b), if any, the
21 applicable effective date of any such "opt in" (i.e., the claim being commenced for
22 purposes of 29 U.S.C. § 256) shall be thirty-two (32) days preceding the time written
23 consent to become an opt-in plaintiff is filed with the Court. This modification is in
24 allowance for the stipulated extension of time set forth in paragraph 2 above. However,
25 in no case shall any consent to join this litigation be deemed to have been filed with the
26 Court prior to the date of filing of the Complaint.

27 IT IS SO STIPULATED.

1 DATED: July 12, 2007

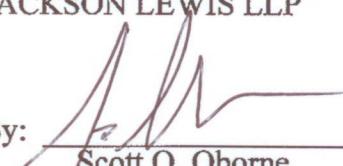
NICHOLS KASTER & ANDERSON, LLP

2 By: 

3 Bryan J. Schwartz
4 Attorneys for Individual and
5 Representative Plaintiffs

6 DATED: July 12, 2007

JACKSON LEWIS LLP

7 By: 

8 Scott O. Osborne
9 Attorneys for Defendants

1 CERTIFICATE OF SERVICE2 **CASE:** EDWARD ABRAM, JR., et al v. AMERICAN HOME MORTGAGE INV., et al.
3 **CASE NO.:** USDC-ND CA C07-03252
4 **CLIENT:** 1131255 I, Jeffrey B. Meade, declare that I am employed with the law firm of Jackson,
6 Lewis, LLP, whose address is 121 SW Salmon Street, 11th Floor, Portland OR 97204; I am over
the age of eighteen (18) years and am not a party to this action.7 On July 12, 2007, I served the attached STIPULATION TO EXTEND TIME
8 FOR DEFENDANTS AMERICAN HOME MORTGAGE INVESTMENT CORP. AND
9 AMERICAN HOME MORTGAGE CORP. TO RESPOND TO PLAINTIFFS' COMPLAINT in
10 this action by placing true and correct copies thereof, enclosed in sealed envelope(s) addressed as
11 follows:12 Bryan J. Schwartz
13 NICHOLS KASTER & ANDERSON, LLP
One Embarcadero Center, Suite 720
14 San Francisco, CA 94111Adam T. Klein
Jack A. Raisner
OUTTEN & GOLDEN, LLP
3 Park Avenue, 29 Floor
New York, New York 1001615 Matthew C. Helland
16 Paul J. Lukas
17 Donald H. Nichols
NICHOLS KASTER & ANDERSON, PLLP
80 South Eighth Street, Suite 4600
18 Minneapolis, MN 5540219 [XX] BY MAIL: United States Postal Service by placing sealed envelopes with the postage
20 thereon fully prepaid, placed for collection and mailing on this date, following ordinary
business practices, in the United States mail at Portland Oregon.21 [] BY HAND DELIVERY: I caused such envelope(s) to be delivered by hand to the above
22 address.23 I declare that I am employed in the office of a member of the bar of this Court at
24 whose direction the service was made.

25 Executed on July 12, 2007, at Portland, Oregon.

26 
27 Jeffrey B. Meade
28